THE CONTINUING EDUCATION COORDINATOR'S

BULLETIN

INFORMATION AND IDEAS FROM THE INDIAN HEALTH SERVICE CLINICAL SUPPORT CENTER

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There have been additional changes made to the requirements for disclosure of potential conflicts of interest, and we share them here. In this issue, we will review all of the requirements, and for emphasis, we have ***bolded*** *some of the new or often overlooked information. Back issues of The Bulletin are always available by contacting our office (see the back page of this issue) or by visiting the IHS website (*www.ihs.gov*). We have attached a list of the subjects that have been covered in the past.*

FACULTY DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST – REVISITED

For all continuing education activities sponsored by any accredited sponsor for physician or nurse continuing professional education credit, there is a requirement for all faculty members to complete a "Disclosure" form, and for the information obtained from that form to be conveyed to those attending an activity **prior to the activity**.

The purpose of this disclosure process is to assure that those who attend will be aware of any financial or other relationships between any faculty member and any manufacturers of any commercial products discussed in any presentation. This only makes sense; it is important for those listening to a presentation to be able to judge whether or not any such relationship might create any commercial bias.

The information that must be disclosed includes the name of the company and the nature of the relationships that exist now or have existed within the past 12 months.

As most of our coordinators know, the way this is accomplished is to ask each faculty member, when they agree to speak, to read, complete, and sign the Disclosure Form. The information obtained from these forms should then be shared with the audience **in writing in the preconference publicity and in the course materials**, most often on the Faculty List.

While in the past, verbal disclosure statements have been an option, new rules make documenting this such a cumbersome process that we ask that you use and submit copies of written disclosure for every activity.

The easiest way to accomplish this is to include a statement in the preconference publicity and/or on the faculty list distributed with the course materials at the start of the activity to the effect that "Dr. Jones is on the speaker's bureau for Company A, and Dr. Smith has a research grant from Company B to study the epidemiology of Parkinson's Disease in minority populations. All other faculty members have indicated that they have no significant financial or other relationships to disclose." If a speaker declines to complete this process, this, too, must be conveyed to the audience. **Disclosure must occur even if no relationships exist**.

Even though this information is conveyed in the preconference publicity and in the course materials, it is a good practice to repeat the announcement of any significant relationships verbally when the presenter is introduced. Some coordinators place the information on a slide at the beginning of the presentation.

Even for an ongoing series of one-hour presentations, for example "Grand Rounds," we ask that you include the disclosure statements on the weekly announcement so that it is easy to show that this took place by submitting a sample to us for the file.

Presentations must give a balanced view of therapeutic options. Faculty use of generic names will contribute to this impartiality. If trade names are used, those of several companies should be used rather than that of a single company. When an unlabeled or investigational use of any product is discussed during an educational activity, the speaker must so identify this use. There is a statement on the "Disclosure" form that indicates that the speaker understands and will abide by these standards (see revised Disclosure form, attached). **This box must be checked.**

As the accredited sponsor of your activity, we are required to be able to show that disclosure took place for every speaker for every activity. While there is a space at the bottom of the "Disclosure" form for you, as the coordinator, to check to indicate that disclosure of the information from the form took place, we are also asking you to submit copies of the announcements and/or course materials with the actual disclosure statements that the participants saw. **Please understand that simply sending us the completed Disclosure Forms does not suffice**.

THE BOTTOM LINE . . .

Disclosure is required of all presenters at all activities sponsored for continuing professional education. As on-site coordinators, you are obligated to convey the information learned from the completed forms to the participants, and to submit documentation of this for the permanent records of the activity. This documentation process serves a useful purpose in that it assures that we will be aware of any potential conflicts of interest, and more importantly, assures that the audience will know about it. As in health care, "if it isn't in the record, it didn't happen," and so documentation of the way the participants were informed is equally important. This same disclosure process can also help us assure that all presenters inform the audience about "off-label" and investigational uses of medications, and encourage the use of generic rather than trade names. Attached is a current "Disclosure" form that will help us accomplish all of this, with your assistance.

If you are not on the mailing list for this *Bulletin* or wish to receive any back issues, please call us at 602-364-7777 or write to:

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